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PLEASE REPLY TO ROSELAND

October 26, 1999

Muthu Sundram, Esq.
Assistant Regional Counsel
Office of Regional Counsel
US Environmental Protection Agency - Region II
290 Broadway, 17th Floor
New York, NY 10007

Re: LCP Chemicals Site, Linden, New Jersey
EPA Order Index No. II-CERCLA-02-99-2015

Dear Muthu:

Enclosed is an Access Order which was signed by Judge Weiss giving ISP and its authorized contractors access to the LCP site.

Paragraph 25 of the Consent Order requires ISP to submit a work plan for the performance of the RI/FS within 30 days of ISP gaining access to the site. Pursuant to my conversation with Patricia Simmons, this 30 day period will commence on October 25, 1999. Therefore, ISP will submit the RI/FS Work Plan on or before November 22, 1999.

Pursuant to the Court Order as well as the Access Agreement with Active Water Jet, ISP's contractor will notify Active Water Jet prior to coming onto the site.

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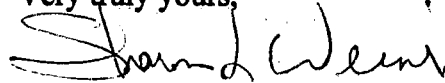
• Muthu Sundram, Esq.

October 26, 1999

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Please feel free to contact me if you require any additional information.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Sharon L. Weiner".

SHARON L. WEINER

SLW:jmc

Enclosure

cc: Patricia Simmons (w/encl.)
Carrie McGowan (w/encl.)
Tom Piscotta (w/encl.)

FILED

OCT 22 1999

**LAWRENCE WEISS
J.S.C.**

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ROSELAND, NEW JERSEY 07068-1776
(973) 740-0500
Attorneys for Plaintiff
ISP Environmental Services, Inc.**

**ISP Environmental Services, Inc. a
Delaware Corporation,**

Plaintiff,

vs.

**HANLIN GROUP, INC. and LCP
CHEMICALS, INC.,**

Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: UNION COUNTY**

DOCKET NO.

Civil Action

**ACCESS ORDER
PURSUANT TO N.J.S.A. 58:10B-16**

THIS MATTER having been opened to the Court by Wolff & Samson, P.A., attorneys for plaintiff ISP Environmental Services, Inc. ("ISP") upon notice to defendants Hanlin Group, Inc. and LCP Chemicals, Inc. (collectively, "Defendants") seeking the issuance of an access order for remediation purposes pursuant to N.J.S.A. 58:10B-16, and the Court having considered the papers submitted by the parties, and the arguments of counsel, and having determined that the showing has been made under N.J.S.A. 58:10B-16(b) that access to the subject property is reasonable and necessary to remediate contamination, and for good cause shown;

IT IS on this 22 day of October, 1999;

ORDERED that ISP and its authorized contractors are hereby granted access to the real property located off at South Wood Avenue on the Tremley Peninsula in Linden,

New Jersey, known as the LCP Chemicals, Inc. Superfund Site (the "Property") under the following conditions:

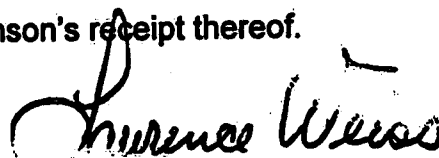
1. ISP and its authorized contractors shall enter the Property to conduct all activities necessary to complete the Remedial Investigation/Feasibility Study required by the Administrative Consent Order entered into in May 1999 between ISP and the United States Environmental Protection Agency regarding the Property.

2. ISP and its authorized contractors will give the current tenant, Active Water Jet, advance notice of the dates on which ISP or its contractor plans to enter the Property for the purposes of performing the work contemplated by this Order.

3. Pursuant to N.J.S.A. 58:10B-16(a)(2)(c), ISP will take all reasonable measures to minimize disruption to the Property.

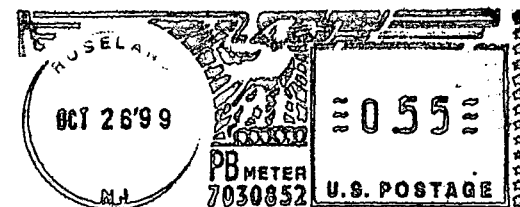
4. Pursuant to N.J.S.A. 58:10B-16(a)(2)(c), ISP will take all reasonable measures to return the Property to its condition prior to the commencement of the monitoring well installation.

IT IS FURTHER ORDERED that counsel for ISP shall provide a copy of this order upon the last known address of the registered agents of Defendants, upon their bankruptcy counsel Lisa S. Bonsall, Esq., and the Secretary of State of the State of New Jersey within seven (7) days of Wolff & Samson's receipt thereof.



HONORABLE LAWRENCE WEISS, J.S.C.

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